

*A Partnership Including
Professional Corporations*
227 West Monroe Street
Chicago, IL 60606-5096
312-372-2000
Facsimile 312-984-2098

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MCDERMOTT, WILL & EMERY

Louis M. Rundio, Jr.
Attorney at Law
312-984-7710

May 8, 2001

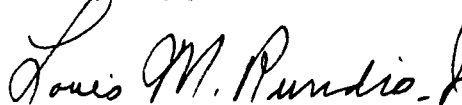
Deena Sheppard-Johnson, SR-6J
U.S. Environmental Protection Agency
Remedial Enforcement Support Section
77 West Jackson Boulevard
Chicago, IL 60604

Re: Chemical Recovery-Elyria, Ohio

Dear Ms. Sheppard-Johnson:

On behalf of CHEMCENTRAL Corporation, I am providing you with responses to your recent letter requesting information regarding the Chemical Recovery location in Elyria, Ohio. Further contact about this matter should be made with Louis M. Rundio, Jr., McDermott, Will & Emery, 227 West Monroe Street, Chicago, IL 60606, (312) 984-7710.

Very truly yours,



Louis M. Rundio, Jr.

LRM:ilh
Enclosure
CHI99 3711085-1.034269.0019

US EPA RECORDS CENTER REGION 5



463528

CHEMCENTRAL CORPORATION'S RESPONSES

1. Current managers at the Company's locations in the Cleveland and Toledo areas and current employees who worked at these locations between 1960 and 1981 and who would most likely know of any contacts with Obitts Chemical Company or Chemical Recovery Systems, Inc. (Obitts/CRS). At the Toledo location, Robert Vlasnik (General Manager), Bill Arnett (Plant Manager), Floyd Swope, and Ron Sieving. At the Cleveland location Bill Zorn (General Manager), Sharon Kwiatkowski, John Edgehouse, Ray Lazavoic, Louie Vladislav, and Bob Helmerich.
2. Responses from the Cleveland and Toledo locations about employee recollections. Transaction documents from the 1960 to 1981 time period are not to be retained under the Company's document retention policy.
3. The Company is not aware of any.
4. Cleveland: OHD 008928319
Toledo: OHD 018384164
5. The Company believes that no Company employees undertook any acts or omissions that caused any release at the Obitts/CRS location. The Company is not aware of persons whose actions or omissions caused any release or damages at the Obitts/CRS location.

6. The Company is not aware of any persons with knowledge of activities at the Obitts/CRS location.
7. The Company is not aware of any arrangements between 1960 and 1981 with any of the entities or individuals identified in Question 7 except that around 1979 to 1981, Michigan Recovery possibly came to the Cleveland location and cleaned out some drums. Currently, one and possibly more of the Company's location transact business with the Michigan Recovery System location in Romulus, Michigan. Clearly these transactions are not with the Obitts/CRS location and these transactions are not within the relevant time period. A request under the Freedom of Information Act has been sent to U.S. EPA for documents indicating any transactions between the Company and the entities or individuals identified in Question 7.
8. The Company is not aware of any.
9. The Company is not aware of any.
10. The Company will make copies of insurance policies available at its offices at a mutually convenient time for U.S. EPA to review and inspect.
11. The Company is a closely held corporation whose tax returns are confidential and private. The Company wishes to maintain the confidentiality of its tax returns and does not wish to submit these documents for public scrutiny. The Company will,

therefore, make available for review and inspection by U.S. EPA, at Company offices and at a mutually convenient time, copies of tax returns subject to all of the confidentiality provisions and procedures of 40 CFR Part 2 Subparts A and B and any other applicable provisions.

12. a) The Company will make copies of its Articles of Incorporation and By-laws available at its offices at a mutually convenient time for U.S. EPA to review and inspect.

12. b) and c) The Company is a closely held corporation whose financial information, however, characterized, is confidential and private. The Company wishes to maintain the confidentiality of its financial information and does not wish to submit financial documents for public scrutiny. The Company will, therefore, make available for review and inspection by U.S. EPA, at Company offices at a mutually convenient time, copies of financial statements subject to all of the confidentiality provisions and procedures of 40 CFR Part 2 Subparts A and B and any other applicable provisions.

12. d) The Company has one subsidiary, WPTE, Inc. a Wisconsin corporation.

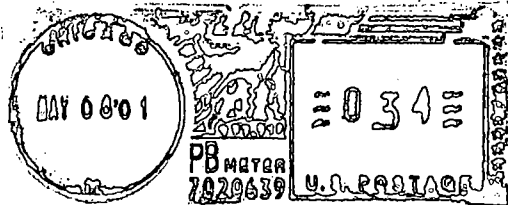
13. Not applicable

14. Not applicable

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60604-3311 10

